

ARIEL E. STERN, ESQ.  
Nevada Bar No. 8276  
JAMIE K. COMBS, ESQ.  
Nevada Bar No. 13088  
AKERMAN LLP  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
Telephone: (702) 634-5000  
Facsimile: (702) 380-8572  
Email: ariel.stern@akerman.com  
Email: jamie.combs@akerman.com

*Attorneys for BMW Financial Services NA, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CLAYTON R. FREEMAN.

Case No. 2:20-cv-01355-JCM-BNW

**Plaintiff,**

v.

BMW FINANCIAL SERVICES NA, LLC;  
EQUIFAX INFORMATION SERVICES, LLC;  
EXPERIAN INFORMATION SOLUTIONS,  
INC..

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT**

**(SECOND REQUEST)**

Clayton R. Freeman (**Freeman**) and BMW Financial Services NA, LLC (**BMW**), hereby stipulate and agree that BMW shall have an additional fourteen (14) days, up to and including **October 9, 2020**, to file its response to the plaintiff's complaint, which is currently due on September 25, 2020. The complaint was filed on July 22, 2020.

Good cause exists to grant the requested extension. BMW requested the extension from Freeman so that the parties can continue to explore settlement options.

1        This is the parties' second request for an extension of this deadline, and is not intended to  
2 cause any delay or prejudice to any party.

3        DATED this 25<sup>th</sup> day of September, 2020.

4 <b>AKERMAN LLP</b>	5 <b>KIND LAW</b>
5 <i>/s/ Jamie K. Combs</i>	6 <i>/s/ Michael Kind</i>
6           ARIEL E. STERN, ESQ.	7           MICHAEL KIND, ESQ.
7           Nevada Bar No. 8276	8           Nevada Bar No. 13903
8           JAMIE K. COMBS, ESQ.	9           8860 S. Maryland Parkway, Suite 106
9           Nevada Bar No. 13088	10          Las Vegas, NV 89123
10          1635 Village Center Circle, Suite 200	
11          Las Vegas, NV 89134	
12 <i>Attorneys for BMW Financial Services NA, LLC</i>	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

11           **IT IS SO ORDERED.**

12           

13           **UNITED STATES DISTRICT COURT JUDGE**  
14           Case No. 2:20-cv-01355-JCM-BNW

15           **DATED:** September 29, 2020